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August 2, 2018

VIA ECF

The Honorable Henry Pitman
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Coventry Capital US LLC v. EEA Life Settlements, Inc., et al.,*
Civil Action No. 1:17-cv-07417-VM-HBP

Dear Judge Pitman:

I write on behalf of Plaintiff Coventry Capital US LLC (“Coventry Capital”) to supplement the parties’ May 18, 2018 submissions regarding the schedule in this matter. *See* D.E. 64; D.E. 65. As discussed at the May 11, 2018 conference, Coventry Capital seeks to move this case forward as quickly as possible. Before it can do so, however, certain threshold issues regarding the scope of discovery in this matter need to be resolved, including Coventry Capital’s (a) pending motions (which are scheduled to be heard on August 14, 2018); and (b) renewed motion to compel, the timing of which depends in part on the Court’s rulings on the pending motions. Coventry Capital thus reluctantly requests an extension of the current schedule beyond its May 18, 2018 proposal, *see* D.E. 65, as set forth on the following page. This proposal is necessarily tentative, as further extensions may be needed depending on the time needed to resolve the pending motions and/or renewed motion to compel (including any appeals), review additional documents produced by Defendants in response to resolution of those motions, and complete merits discovery (including fact witness depositions).

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Subject to the foregoing caveats, Coventry Capital proposes the following:

Event	Current Date¹	Proposed Date
Requests for Admission to be served	May 1, 2018	December 17, 2018
Close of fact discovery	June 1, 2018	January 15, 2019
Expert reports due (for party bearing the burden of proof)	August 10, 2018	February 26, 2019
Rebuttal expert reports	September 10, 2018	April 9, 2019
Close of expert discovery	October 10, 2018	May 10, 2019
Deadline for parties to attend settlement conference	November 10, 2018	May 13, 2019

Coventry Capital has conferred with counsel for Defendants and understands that they agree to the proposed schedule above. We are happy to discuss this further at the August 14, 2018 hearing as needed.

Respectfully submitted,

William P. Ashworth

cc: Counsel of Record

¹ See D.E. 36 (December 7, 2017 Civil Case Management Plan and Scheduling Order).